



NATIONAL FUTURES ASSOCIATION

Received CFTC
Records Section

10/11/06

October 9, 2006

06-6
①

2006 OCT 10 AM 10:15
OFC. OF THE SECRETARIAT

RECEIVED
CFTC

Via E-Mail (secretary@cftc.gov)

Ms. Eileen Donovan
Acting Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581



Re: RIN 3038-AC34; Proposed Amendments to Rules 1.10 and 1.31

Dear Ms. Donovan:

NFA fully supports the Commission's proposed amendments to its rules that respond to NFA's petition for rulemaking to facilitate the electronic filing of IB financial reports. These amendments will simplify the filing process and allow it to keep pace with technological changes without losing any of the protections provided by the current requirements.

We commend the Commission for its foresight in proposing additional amendments to Rule 1.10(h) to give NFA the flexibility to adopt an electronic filing requirement for IB FOCUS reports without necessitating further changes to CFTC rules. As we mentioned in our petition for rulemaking, our EasyFile system is not yet equipped to handle FOCUS reports, but we hope to add that capability in the future. The proposed amendments will expedite that process.

If you have any questions concerning this letter, please contact me at 312-781-1413 or tsexton@nfa.futures.org.

Respectfully submitted,

Thomas W. Sexton
Vice President and General Counsel

cc: Lawrence B. Patent (lpatent@cftc.gov)

(kpc/comment letters/IB Reporting Requirements)